

## REMARKS

Claims 1 to 8 were pending when last examined. The Office Action rejected claims 1 to 8 under 35 U.S.C. § 103(a) based on diverse combinations of cited references, including the article “Pyramidal Implementation of the Lucas Kanade Feature Tracker – Description of the Algorithm” (“Bouguet” hereafter), U.S. Patent Application Publication No. 2004/0017507 (“Clayton” hereafter), the article “The Laplacian Pyramid as a Compact Image Code” (“Burt” hereafter), the article “Determining Optical Flow” (“Horn” hereafter), and U.S. Patent No. 6,594,313 (“Hazra” hereafter). In response, Applicants have amended claims 1, 4, 5 and 7, and canceled claims 2, 3, 6 and 8. New claims 9 to 20 have also been added for consideration. Claims 1, 4, 5, 7, and 9 to 20 now are pending in the present application. The rejections are overcome for at least the reasons stated below.

### §103 Rejections

Amended claim 1 recites the feature of generating an intermediate image between the first and the second image on a pixel-by-pixel basis derived from the motion field. None of the cited references teach or suggest this feature.

As admitted in the Office Action, neither Bouguet nor Clayton discloses generating an intermediate image on a pixel-by-pixel basis. Therefore, the Office Action cited Hazra for disclosing the generation of the intermediate image. However, Hazra do not disclose generating the intermediate image on a pixel-by-pixel basis. Instead, Hazra teaches forming the intermediate image on a block-by-block basis.

*“Synthesizer 114 receives the best motion vector for each block in the interpolated frame (t-1/2) 208 from mechanism 110 and the pixel state classification for each pixel in frame (t) 202 from pixel state classifier 112 and creates interpolated frame (t-1/2) 208 by synthesizing on a block-by-block basis.”* Col. 4, lines 5-10.

The foregoing clearly illustrates that Hazra does not form the intermediate image pixel by pixel. Hazra thus fails to cure the deficiencies of Bouguet and Clayton. Further, none of the other cited references of Burt and Horn either teaches or suggests the claimed method in which the intermediate image is generated on a pixel-by-pixel basis.

For at least the foregoing reasons, Applicants submit that the cited references cannot render claim 1 unpatentable. At least by virtue of their respective dependency on patentable claim 1, claims

4, 5 and 7 should also patentably distinguish from the cited references. Accordingly, withdrawal of the rejection and allowance for these claims is respectfully requested.

#### New claims 9-20

Applicants have added new claims 9-20 to cover additional patentable features undisclosed by the cited references. Consideration and allowance for these claims are also respectfully requested.

#### Summary

For at least the above reasons, Applicants respectfully request the Examiner to withdraw the claim rejections and allow all the pending claims. Should the Examiner have any questions, please call the undersigned at (408) 382-0480.

I hereby certify that this correspondence is being transmitted prior to expiration of the set period of time by being transmitted via the Office electronic filing system in accordance with § 1.6(a)(4).

/David C Hsia/  
Signature

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Date

Respectfully submitted,

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